LANDAU FORTE CHARITABLE TRUST

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Introduction

This document outlines Landau Forte Charitable Trust's (The Trust) approach to managing Freedom of Information (FOI) requests received. This document is based on guidance issued by the Department for Education (DfE) and approved by the Information Commissioner in February 2014 and applies to all Academies within the Trust.

The responsibility for the upkeep of this document resets with the Trust's Deputy CEO and will be reviewed as a minimum on an annual basis. The annual review will correct minor process changes or new guidance from either the DfE or Information Commissioner. The policy will undergo full review by the Trust's Audit Committee at least once every 5 years.

Section 1: Responsibilities

Individual Responsibilities:

As the Accounting Officer of the Academy, the Principal, or in the case of the Trust, the Chief Executive is responsible for ensuring all requests falling under the scope of the Freedom of Information Act (FOIA) are responded to in the correct manner and in line with the legislation.

The Chief Executive or Principal may delegate the collection of information to members of the Academy e.g. Deputy CEO, PA etc however the responsibility for fulfilling a request remains with the Chief Executive or Deputy CEO.

All staff need to be aware of the Trust's FOI policy and the process for handling FOI requests. Any requests received by staff members must be forwarded to the Academy Principal.

Where an Academy receives a request covering more than one Academy within the Trust the Academy who received the initial request will be responsible for coordinating the information from the other Academies concerned.

A central record will be maintained on the Trust's shared area as a log of all FOI requests and the outcome of these requests. This record will be reviewed by the Deputy CEO on a biannual basis and report any requests and trends to the Trust's Audit Committee.

Information Requests:

The FOIA was introduced to promote greater openness and accountability across the public sector and establishes a general right of access to information held by public authorities, which includes Academies. Academies therefore have a duty to provide advice and assistance to anyone requesting information.

A FOI request should:

i. be in writing;
ii. state the enquirer's name and correspondence address;
iii. describe the information requested (there must be enough information to be able to identify and locate the information); and
iv. not be covered by other legislation.

Enquirers do not have to say why the information is being requested.

Verbal enquiries are not covered by the FOIA. Such enquiries can be dealt with where the enquiry is relatively straightforward and can be dealt with satisfactorily. However, for more complex enquiries, the Trust will ask the enquirer to put the request in writing, when the request will become subject to FOI.

Where an enquiry is ambiguous the Trust will assist the enquirer to describe more clearly the information requested. This must be to clarify the nature of the information requested and not to determine the aims or motivation of the enquirer. In line with legislation where further information is required the Trust will not deal with the request until the further information is received. The response time limit starts from the date that further information is received.

Responding to Requests:

There are only four reasons for not complying with a valid request for information under the FOIA:

i. the information is not held;
ii. the cost threshold is reached (See Section 3);
iii. the request is considered vexatious or repeated; or
iv. one or more exemptions apply.

Details of exemptions are included in Appendix 3, however some may be overridden by public interest considerations (see Appendix 4).

The enquirer is entitled to be told whether the Trust holds the information and, if so, to have access to it. Access can include providing extracts of a document or a summary of the information sought, or access to the original document. However, the FOIA recognises the need to preserve confidentiality of sensitive information in some circumstances.

Compliance with a request must be prompt and within the legally prescribed limit of 20 working days, excluding non-school days (days where there are no school sessions). Where the 20th day to respond to a request is during a non-school day, the Trust will have up to 60 days to respond. The response time starts from the time the request is received. Where further information is required from the enquirer for the request to be processed the time begins following the response from the enquirer.

Where a charge is to be made, the time period stops until payment is received and then continues again once payment has been received.

To handle a request for information the Deputy CEO will follow the following process:

1. **Identify if the request is covered by FOIA:**
   Requests for personal data are made under the Data Protection Act and should follow the Trust Data Protection Policy. Environmental Information Regulations enquiries are ones which relate to air, water, land, natural sites, built environment, flora and fauna, and health, and any decisions and activities affecting any of these. If the enquiry is about environmental information, follow the guidance on the ICO's website or the DEFRA website.

   FOI enquiries are concerned with all other information and the reasoning behind decisions and policies. All requests for information that are not data protection or environmental information requests are covered by the FOIA.

2. **Identify if the request is valid:**
   Confirm whether the request meets the criteria outlined under Information Requests.

3. **Identify if the Trust holds the information:**
   Holding information means information relating to the operation of the Trust or an indidivual Academy:
   i. the Trust has created; or
   ii. the Trust has received from another body or person; or
   iii. held by another body on the Trust's behalf.

Information can be in both hard copy or digital form (including email). If the Trust does not hold the information it does not have to be created or acquired to just answer the enquiry; although a reasonable search should be made before denying that information exists that the Trust might be expected to hold.

4. **Identify if the information is already public:**
   If the information requested is already in the public domain, for instance through the Publication Scheme (Section 2) or on the website, direct the enquirer to the information and explain how to access it.

5. **Determine if the request is vexatious or manifestly unreasonable:**
   The FOIA states that there is no obligation to comply with vexatious requests. This is taken to mean a request which is designed to cause inconvenience, harassment or expense rather than to obtain information, and would require a substantial diversion of resources or would otherwise undermine the work of the Trust.

   It is not intended to include otherwise valid requests in which the applicant may make complaints or vent frustrations. In addition, the Trust does not have to comply with repeated identical or substantially similar requests from the same applicant unless a "reasonable" interval has elapsed between requests.

6. **Consider if a third party's interests could be affected by disclosure:**
   Consultation of third parties may be required if their interests could be affected by release of the information requested, and any such consultation may influence the decision. The Trust does not need to consult where an exemption can be applied.

   Consultation will help to determine if information is exempt from disclosure, disclosure may affect the legal rights of a third party, or the view of the third party may assist in determining the public interest of a disclosure.

7. **Consider if an exemption applies:**
   The presumption of the legislation is that information will be disclosed unless the FOIA provides a specific reason to withhold it. Appendix 3 contains further details on exemptions.

8. **Disclose Information**
   Information will be disclosed in line with the timescales set out above.

Redacting Documents:

Personal information requested by third parties (i.e. personal information belonging to someone other than the requestor) is exempt from release under the FOIA where this release would breach the Data Protection Act.

If a request is made for a document (e.g. Governing Body minutes) which contains personal information whose release to a third party would breach the Data Protection Act, the document may be issued by blanking out the relevant personal information as set out below.

When redacting released documents:

i. mask the passages which are not to be disclosed and photocopy;
ii. annotate in the margin against each blank passage, the exemption and section of the Act under which this passage is exempt; and
iii. explain in the covering letter that the relevant exemptions are marked in the attachments and in the case of non-absolute exemptions, how the public interest test has been considered.

On no account must the computer be used to rewrite the document or email and simply delete the exempted passages so that the resulting document appears as though they did not exist. The one circumstance where this would be permissible would be where the only redacted parts are personal information such as people's names and the covering letter explains this.

Refusing Requests:

If the information is not to be provided, the Principal dealing with the request must immediately contact the Chief Executive to ensure that the case has been properly considered and the reasons for refusal are sound.

If it is decided to refuse a request a refusal notice will be sent to the enquirer identifying:

i. that the Academy/Trust cannot provide the information asked for;
ii. which exemption are believed to apply;
iii. why the exemption applies to the enquiry; and
iv. the complaints procedure.

A central register will be maintained of all enquiries, the result of the request and the reason for any exemptions claimed. Records will be maintained for at least 5 years.

Complaints:

Any written expression of dissatisfaction will be handled through the Trust's existing complaints procedure and will be handled by an appropriate individual not involved in the original request for information.

When the original request has been reviewed and the outcome is that the information should be disclosed this should be done as soon as practicable. When the outcome is that procedures within the Trust have not been properly followed, the Trust will review procedures to prevent any recurrence. When the outcome upholds the Trust's original decision or action, the applicant should be informed of their right to appeal to the Information Commissioner. The appeal should be made in writing to:

The Case Reception Unit
Customer Service Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Section 2: Freedom of Information Publication Scheme

1. What is a publication scheme and why it has been developed

This publication scheme commits The Trust to make information available to the public as part of its normal business activities. The information covered is included in the classes of information below, where this information is held by the Trust.

The scheme commits the Trust:

- To proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the Trust and falls within the classifications below.

- To specify the information which is held by the Trust and falls within the classifications below to proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme;

- To produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public;

- To review and update on a regular basis the information the Trust makes available under this scheme;

- To produce a schedule of any fees charged for access to information which is made available; and

- To make this publication scheme available to the public.

2. Classes of information

Class1: Who we are and what we do
Organisational information, locations and contacts, constitutional and legal governance.

Class 2: What we spend and how we spend it
Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.

Class 3: What our priorities are and how we are doing
Strategy and performance information, plans, assessments, inspections and reviews.

Class 4: How we make decisions
Policy proposals and decisions. Decision making processes, internal criteria and procedures, consultations.

Class 5: Our policies and procedures
Current written protocols for delivering our functions and responsibilities.

Class 6: Lists and registers
Information held in registers required by law and other lists and registers relating to the functions of the Trust.

Class 7: The services we offer
Booklets, publications and media releases. A description of the services offered.

classes of information will not generally include:

- Information; the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure.
- Information in draft form.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons.

3. The method by which information published under this scheme will be made available

The Trust will indicate clearly to the public what information is covered by this scheme and how it can be obtained. This will be done by publishing this policy on the Trust and Academy websites.

Where it is within the capability of the Trust, information will be provided on our website. Where it is impracticable to make information available on a website or when an individual does not wish to access the information by the website, the Trust will indicate how information can be obtained by other means.

Further details on publication under this scheme are contained in Appendix 1.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where the Trust is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

4. Charges which may be made for Information published under this scheme

The purpose of this scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public. Charges made by the Trust for routinely published material will be justified and transparent and kept to a minimum.

Material which is published and accessed on a website will be provided free of charge.

Charges may be made for information subject to a charging regime in line with guidance specified by the Information Commissioner.

Charges may be made for actual disbursements incurred such as:

- photocopying
- postage and packaging
- the costs directly incurred as a result of viewing information

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

If a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

5. Written requests

Information held by a public authority that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

Contact details are set out below or can be found via the Trust's website http://www.lfct.org.uk/

Email: post@lfct.org.uk
Address: Landau Forte Charitable Trust, Fox Street, Derby DE1 2LF

To help process requests please mark correspondence "Publication Scheme Request".

Section 3: Freedom of Information Charging Policy

The right under the Freedom of Information Act (FOI) and the Environmental Information Regulations (EIR) to request information held by public authorities, known as “the right to know”, came into force for Academies on 1 January 2011.

Fee Regulations

The method of calculating charges within this policy is in accordance with the Freedom of Information and Data Protection (appropriate limits and fees) Regulations 2004.

Estimating the costs of processing requests (section 4(3) of the FOI regulations)

When estimating the cost of complying with a written request for information, the Trust will take into account the staff time involved in the following activities:

- Determining whether the information is held.
- Locating the information or a document that may contain the information.
- Retrieving and exacting the information, or a document that may contain the information.

The cost of the above activities will be calculated by applying an hourly rate of £25 per person, (section 4(4) of the FOI regulations).

When calculating the costs to process requests, the Trust cannot take account of the time taken to consider whether information is exempt under the Act.

Where the cost to process a request is below £450

Where the cost of complying with a written request for information is estimated to be below £450, there will be no charge unless the disbursement costs (printing, copying and postage) exceed £5. Where disbursement costs exceed £5, the applicant will be issued with a fees notice and must pay the costs within a period of three months before the Trust can comply with the request. Disbursements costs applied by the Trust are shown in Appendix 2.

Where the cost to process a request exceeds £450

In accordance with the Freedom of Information and Data Protection (appropriate Limits and Fees) Regulations 2004, the Trust is not obliged to respond to a written request for information, where it estimates that the cost of complying with the request would be in excess of £450 (which equates to 18 hours of work at £25 per hour).

In calculating the cost to process a request the Trust will include:

- Staff costs (£25 per hour) involved in determining whether the Trust holds the information.
- Staff costs (£25 per hour) of locating, retrieving and extracting the information.
- Disbursement and staff costs (£25 per hour) incurred in informing the applicant that the information is held.
- Disbursement and staff costs (£25 per hour) incurred in communicating the information to the applicant.

In all cases the costs must be ‘reasonable’.

Campaign requests:

If the Trust receives two or more related requests within a period of 60 consecutive working days, from a person or different persons who appear to be acting in concert or in pursuance of a campaign, the costs of complying with the individual requests will be aggregated.

The Trust will not charge for:

Providing information in an alternative format if the Disability Discrimination Act (DDA) covers the person requesting it, unless the original document was a priced publication. In this case, the charge for the alternative format will not exceed the cost of original publication.

Notifying charges:

- Where charges apply, the Trust will notify the estimated charge to the applicant before doing any charged work.
- Where there is a significant difference between the estimated and the actual charge, the Trust will notify the applicant.
- Where charges apply, the Trust will require payment before compiling and supplying information.
- If a charge is not paid within the specified time limit of 3 months, the information will not be supplied.

Data Protection Act 1998:

Under the Data Protection Act 1998, the Trust will charge an individual the sum of £10 for requesting personal information held by the Trust about the individual. These requests for information are referred to as subject access requests.

The Trust will not process the subject access request until the £10 fee has been received.

Complaints:

If the applicant does not agree with the proposed fee, they can appeal through the Trust's complaints procedure.

Appendix 1: Guide to Information Available under the Publication Scheme

Class1: Who we are and what we do

(Organisational information, structures, locations and contracts)
(This will be current information only)

Information to be published	How the information can be obtained	Charge
Academy structure	Academy Website	No charge
Governing body – names of the Trustees/Governors and the basis of their appointment	Hard copy	Schedule of charges
Academy session times, term dates and holidays	Academy Website	No charge
Location and contact information – address, telephone number and website	Academy Website	No charge
Academy Prospectus	Academy Website	No charge

Class 2: What we spend and how we spend it

(Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit)
Current and previous financial year

Information to be published	How the information can be obtained	Charge
Statutory Accounts	Companies House website www.companieshouse.gov.uk	Schedule of charges
Annual budget plan and financial statements	Hard copy	Schedule of charges
Capital funding	Hard copy	Schedule of charges
Additional funding	Hard copy	Schedule of charges
Procurement and contracts	Hard copy	Schedule of charges
Pay policy	Hard copy	Schedule of charges

Class 3: What our priorities are and how we are doing

(Strategies and plans, performance indicators, audits, inspections and reviews)
Current information

Information to be published	How the information can be obtained	Charge
Academy profile	Academy Website	No charge
Government supplied performance data	Academy Website	No charge
OFSTED report – summary and full report	Academy Website	No charge
Academy's future plans	Hard copy	Schedule of charges
Child protection – policies and procedures on safeguarding and promoting the welfare of children.	Hard copy	Schedule of charges

Class 4: How we make decisions

(Decision making processes and records of decisions)
Current and previous three years as a minimum

Information to be published	How the information can be obtained	Charge
Admissions policy	Academy Website	No charge
Governing body meeting agendas, papers and minutes – information that is properly considered to be private will be excluded.	Hard copy	Schedule of charges

Class 5: Our policies and procedures

Current written protocols, policies and procedures for delivering our services and responsibilities)
Current information only

Information to be published	How the information can be obtained	Charge
Policies including: Charging and remissions policy Health and Safety policy Complaints procedure Staff conduct policy Discipline and grievance policies Pay policy Information request handling policy Staff recruitment policies	Hard copy	Schedule of charges
Pupil and curriculum policies, including: Home Academy agreement Curriculum Sex education Special educational needs Accessibility Race equality Collective worship Careers education	Hard copy	Schedule of charges
Records management and personal data policies	Hard copy	Schedule of charges
Equality and diversity	Hard copy	Schedule of charges

Class 6: Lists and Registers

(Currently maintained lists and registers only)

Information to be published	How the information can be obtained	Charge
Disclosure logs	Hard copy	Schedule of charges
Asset register	Hard copy	Schedule of charges

Class 7: The services we offer

(Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses)
Current information only

Information to be published	How the information can be obtained	Charge
Academy publications	Academy Website	No charge
Leaflets, booklets and newsletters	Academy Website	No charge

Appendix 2: Schedule of Charges

Schedule of Charges	Description	Basis of Charge
Disbursement cost	Photocopying/printing @ 50p per sheet (black & white)	Actual cost 50p
	Photocopying/printing @ 80p per sheet (colour)	Actual cost 80p
	Postage	Actual cost of Royal Mail standard 2nd class
Statutory fee		In accordance with the relevant legislation

Appendix 3 – Exemptions

The Duty to Confirm or Deny:

A person applying for information has the right to be told if the information requested is held by the Academy, and if so to have the information sent (subject to any of the exemptions).

This obligation is known as the Academy's "duty to confirm or deny" that it holds the information. However, the Academy does not have to confirm or deny if:

- the exemption is an absolute exemption; or
- in the case of qualified exemptions, confirming or denying would itself disclose exempted information.

Exemptions:

A series of exemptions are set out in the Act which allow the withholding of information in relation to an enquiry. Some are very specialised in their application and would not usually be relevant to the Trust.

There are two general categories of exemptions:

- **Absolute:** where there is no requirement to confirm or deny that the information is held, disclose the information or consider the public interest.
- **Qualified:** where, even if an exemption applies, there is a duty to consider the public interest in disclosing information.

When considering if an exemption to disclosure should apply, the presence of confidential markings such as Restricted, Confidential and Private does not constitute an exemption and is not in itself sufficient grounds on which to prevent disclosure. Each case must be considered on its merits.

Where information has previously been withheld, it must not be assumed that any subsequent requests for the same information will also be refused. Sensitivity of information decreases with age and the impact of any disclosure will be different depending on when the request is received. Therefore, for each request, it will be necessary to consider the harm that could result at the time of the request and, while taking into account any previous exemption applications, each case should be considered separately.

Absolute Exemptions:

There are 8 absolute exemptions listed in the Act. Even where an absolute exemption applies:

- it does not mean that you can't disclose in all cases; it means that disclosure is not required by the Act. A decision could be taken to ignore the exemption and release the information taking into account all the facts of the case.
- there is still a legal obligation to provide reasonable advice and assistance to the enquirer.

The absolute exemptions within the Act are set out below:

1. **Information accessible to the enquirer by other means** (FOIA Section 21) – including where the enquirer would have to pay for the information, where the Trust is required to give information under other legislation, or as set out in the Trust's Publication Scheme (Section 2).

2. **Information dealing with security matters** (FOIA Section 23)

3. **Court records** (FOIA Section 32)

4. **Parliamentary privilege** (FOIA Section 34)

5. **Prejudice to the effective conduct of public affairs** (FOIA Section 36)

6. **Personal Information** (FOIA Section 40)

7. **Information provided in confidence** (FOIA Section 41)

8. **Prohibitions on disclosure** (FOIA Section 44)

Qualified Exemptions:

With qualified exemptions, even if it is decided that an exemption applies, there is a duty to consider the public interest in confirming or denying that the information exists and in disclosing information. Advice on carrying out the public interest test is included in Appendix 4.

The qualified exemptions in the Act are set out below:

1. **Information accessible to the enquirer by other means** (FOIA Section 21)

2. **Information intended for future publication** (FOIA Section 22)

3. **National security** (FOIA Section 24)

4. **Defence** (FOIA Section 26)

5. **International relations** (FOIA Section 27)

6. **Relations within UK** (FOIA Section 28)

7. **The economy** (FOIA Section 29)

8. **Investigations and proceedings conducted by public authorities** (FOIA Section 30) - Information is exempt if it has at any time been held by the Academy for the purposes of criminal investigations or proceedings, such as determining whether a person should be charged with an offence or whether a charged person is guilty, or investigations which may lead to a decision to institute criminal proceedings. The duty to confirm or deny does not apply to such information.

9. **Law enforcement** (FOIA Section 31) - may be exempt under this exemption in the event that disclosure would, or would be likely to, prejudice the following among others: the prevention or detection of crime, the apprehension or prosecution of offenders, or the administration of justice. The duty to confirm or deny does not arise where prejudice would result to any of these matters.

10. **Audit Functions** (FOIA Section 33)

11. **Formulation of government policy** (FOIA Section 35)

12. **Prejudice to the conduct of public affairs** (FOIA Section 36)

13. **Communications with the Queen** (FOIA Section 37)

14. **Health and Safety** (FOIA Section 38) - Information is exempt if its disclosure would or would be likely to endanger the safety or physical or mental health of any individual. The duty to confirm or deny does not arise where prejudice would result.

15. **Environmental information** (FOIA Section 39)

16. **Personal Information** (FOIA Section 40)

17. **Legal professional privilege** (FOIA Section 42) - Legal professional privilege covers any advice given by legal advisers, solicitors and barristers. Generally such information will be privileged.

18. **Commercial interests** (FOIA Section 43) - Information is exempt if it constitutes a trade secret or would be likely to prejudice the commercial interests of any person or body.

Further guidance can be found in the Department for Education publication "Academies and Freedom of Information – Departmental advice for academies" January 2014.

Appendix 4 – Public Interest

Where a qualified exemption applies to a particular enquiry, a public interest test must be conducted to identify if the public interest in applying the exemption outweighs the public interest in disclosing the information. Therefore, unless it is in the public interest to withhold the information, it has to be released.

It is worth noting that what is in the public interest is not necessarily the same as that which may be of interest to the public. It may be irrelevant that a matter may be the subject of public curiosity.

Applying such a test depends to a high degree on objective judgement and a basic knowledge of the subject matter and its wider impact on the Academy, Trust and possibly wider.

Factors that might be taken into account when weighing the public interest include:

For Disclosure	Against Disclosure
Is disclosure likely to increase access to information held by the Academy?	Is disclosure likely to distort public reporting or be misleading because it is incomplete?
Is disclosure likely to give the reasons for a decision or allow individuals to understand decisions affecting their lives or assist them in challenging those decisions?	Is premature disclosure likely to prejudice fair scrutiny, or release sensitive issues still on the internal agenda or evolving?
Is disclosure likely to improve the accountability and transparency of the Academy in the use of public funds and help to show that it obtains value for money?	Is disclosure likely to cause unnecessary public alarm or confusion?
Is disclosure likely to contribute to public debate and assist the understanding of existing or proposed actions?	Is disclosure likely to seriously jeopardise the Academy's legal or contractual position?
Is disclosure likely to increase public participation in decision-making?	Is disclosure likely to infringe other legislation e.g. Data Protection Act?
Is disclosure likely to increase public participation in political processes in general?	Is disclosure likely to create a controversial precedent on the release of information or impair your ability to obtain information in the future?
Is disclosure likely to bring to light information affecting public safety?	Is disclosure likely to adversely affect the Academy's proper functioning and discourage openness in expressing opinions?
Is disclosure likely to reduce further enquiries on the topic?	If a large amount of information on the topic has already been made available, would further disclosure shed any more light or serve any useful purpose?

The FOIA highlights that:

- potential or actual embarrassment to, or loss of confidence in, the Academy, staff or governors is NOT a valid factor to prevent disclosure;
- the fact that the information is technical, complex to understand and may be misunderstood may not of itself be a reason to withhold information; and
- the balance of the public interest in disclosure cannot always be decided on the basis of whether the disclosure of particular information would cause

harm, but on certain higher order considerations such as the need to preserve confidentiality of internal discussions.

The Principal/Chief Executive will need to record the reasoning for reaching a conclusion on whether to disclose or not. This information should then be stored with the requests log for a minimum of 5 years. The importance of each aspect of the public interest assessment will vary on a case by case basis and no scoring system is prescribed as part of the Trust's policy.

The need to conduct a public interest review must be communicated to the enquirer within 20 days of the request and a decision should be reached and communicated to the enquirer within 10 working days.